

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DIGITAL CACHE, LLC,

Plaintiff

v.

**KINGSTON TECHNOLOGY
(SHANGHAI) CO., LTD.,**

Defendant.

Case No. 6:21-cv-00163-ADA

**UNOPPOSED MOTION TO STAY ALL DEADLINES AND NOTICE OF
SETTLEMENT**

Plaintiff Digital Cache, LLC (“Plaintiff”) hereby notifies the Court that the parties have reached a settlement in principle that will resolve all pending claims between them. The parties request up to and including August 27, 2021, to comply with their obligations under the agreement and submit dismissal papers. Accordingly, Plaintiff files this unopposed motion for a stay of all pending deadlines, up to and including August 27, 2021, so that the parties may finalize the parties’ settlement agreement and submit dismissal papers. This stay is not sought for the purpose of delay but so that justice may be served.

Dated: July 28, 2021

Respectfully submitted,

s/ Isaac Rabicoff

Isaac Rabicoff

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**Counsel for Plaintiff
Digital Cache, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on July 28, 2021, via the Court's CM/ECF system.

/s/ Isaac Rabicoff
Isaac Rabicoff